

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Cotter Corporation (N.S.L.),)
v. Petitioner,) Case No. 4:19-mc-00774-AGF
United States of America, *et al.*)
Respondents.)

**REPLY IN SUPPORT OF REQUEST FOR RELIEF BY BRIDGETON LANDFILL, LLC,
REPUBLIC SERVICES, INC., AND ALLIED SERVICES, LLC**

Respondents Bridgeton Landfill, LLC, Republic Services, Inc., and Allied Services, LLC hereby join in the Reply Brief in Support of its Renewed Request filed by the United States of America (Dkt. No. 55).

WHEREFORE, for the reasons described in detail by the United States of America, Cotter should be held to have waived its attorney-client privilege as to its decision to dispose of radioactive residues from Latty Avenue at the Westlake Landfill and provide previously withheld documents on those subjects to Respondents for potential use in follow-up questions to Mr. McGrath.

Dated: February 7, 2020

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above pleading was served via the U.S. District Court electronic filing system on this 7th day of February 2020.

/s/ William G. Beck
Attorney for Respondents Bridgeton
Landfill, LLC, Republic Services, Inc., and
Allied Services, LLC